

May 15, 2023

Via ECF

Honorable Lorna G. Schofield
U.S. District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, NY 10007

Re: *In re Foreign Exchange Benchmark Rates Antitrust Litigation*
Case No. 1:13-cv-07789-LGS S.D.N.Y.

Dear Judge Schofield:

Pursuant to the Court's May 4, 2023 order ECF No. 2058, class counsel submits an Amended Exhibit A and copies of every tenth invoice from LDS. The invoices provided to the court are highlighted in Amended Exhibit A.

For the period January 2018-December 2021, LDS issued two invoices. One of the invoices was payable upon receipt and the other was subject to deferred payment. Therefore, we are submitting two invoices for each of the following months: October 2018, August 2019, June 2020, and April 2021. All deferred payments have been made. There is only one invoice for February 2022 and December 2022 because no portion of those invoices was deferred by LDS.

Beginning in July 2020, Scott+Scott began hosting data for another client in the Sandbox environment. While LDS continued to provide a consolidated invoice covering all charges for FX and this other matter, Scott+Scott allocated the invoices to each of the matters based on the computational power of the workstations that were allocated to them in terms of memory and CPU cores. The amounts allocated to this other matter were deducted from the amount allocated to the settlement fund and the litigation fund, as shown in Amended Exhibit A.

Respectfully submitted,

Korein Tillery PC

HAUSFELD LLP

s/ Christopher M. Burke
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s/ Michael D. Hausfeld
Michael D. Hausfeld
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Settlement Class Counsel and Counsel for Plaintiffs

Amended Exhibit A – Litigation Data Services, LLC Invoices January 2018-present

Explanation	Invoice Nos.	Month & Year	Total Invoice Amount	Allocation to Litigation Fund	Allocation to Settlement Fund	Allocation to Other Client
Sandbox Data Analysis/Hosting	4752 & 4753	Jan-18	105,417.99	52,709.00	52,709.00	
Sandbox Data Analysis/Hosting	4765 & 4766	Feb-18	80,143.09	40,071.55	40,071.55	
Sandbox Data Analysis/Hosting	4779 & 4780	Mar-18	76,165.59	38,082.80	38,082.80	
Sandbox Data Analysis/Hosting	4901 & 4914	Apr-18	74,768.09	37,384.05	37,384.05	
Sandbox Data Analysis/Hosting	4902 & 4915	May-18	67,078.49	33,539.25	33,539.25	
Sandbox Data Analysis/Hosting	4903 & 4916	Jun-18	65,358.49	32,679.25	32,679.25	
Sandbox Data Analysis/Hosting	4913 & 4917	Jul-18	64,068.49	32,034.25	32,034.25	
Sandbox Data Analysis/Hosting	4768 & 4769	Aug-18	72,238.49	36,119.25	36,119.25	
Sandbox Data Analysis/Hosting	4770 & 4771	Sep-18	72,453.49	36,226.75	36,226.75	
Sandbox Data Analysis/Hosting	4772 & 4773	Oct-18	80,453.49	40,226.75	40,226.75	
Sandbox Data Analysis/Hosting	5005 & 5006	Nov-18	128,047.81	64,023.91	64,023.91	
Sandbox Data Analysis/Hosting	5007 & 5008	Dec-18	125,682.81	62,841.41	62,841.41	
Sandbox Data Analysis/Hosting	5009 & 5010	Jan-19	130,842.81	65,421.41	65,421.41	
Sandbox Data Analysis/Hosting	5011 & 5012	Feb-19	126,112.81	63,056.41	63,056.41	
Sandbox Data Analysis/Hosting	5013 & 5014	Mar-19	129,552.81	64,776.41	64,776.41	
Sandbox Data Analysis/Hosting	5015 & 5016	Apr-19	122,027.81	61,013.91	61,013.91	
Sandbox Data Analysis/Hosting	5017 & 5018	May-19	114,932.81	57,466.41	57,466.41	
Sandbox Data Analysis/Hosting	5019 & 5020	Jun-19	107,407.81	53,703.91	53,703.91	
Sandbox Data Analysis/Hosting	5021 & 5024	Jul-19	111,062.81	55,531.41	55,531.41	
Sandbox Data Analysis/Hosting	5022 & 5025	Aug-19	110,632.81	55,316.41	55,316.41	
Sandbox Data Analysis/Hosting	5023 & 5026	Sep-19	117,082.81	58,541.41	58,541.41	
Sandbox Data Analysis/Hosting	5027 & 5028	Oct-19	108,912.81	54,456.41	54,456.41	
Sandbox Data Analysis/Hosting	5029 & 5030	Nov-19	106,977.81	53,488.91	53,488.91	
Sandbox Data Analysis/Hosting	5031 & 5032	Dec-19	112,137.81	56,068.91	56,068.91	
Sandbox Data Analysis/Hosting	5033 & 5034	Jan-20	109,557.81	54,778.91	54,778.91	

Amended Exhibit A – Litigation Data Services, LLC Invoices January 2018-present

Sandbox Data Analysis/Hosting	5035 & 5036	Feb-20	105,902.81	52,951.41	52,951.41	
Sandbox Data Analysis/Hosting	5037 & 5039	Mar-20	105,902.81	52,951.41	52,951.41	
Sandbox Data Analysis/Hosting	5038 & 5040	Apr-20	110,202.81	55,101.41	55,101.41	
Sandbox Data Analysis/Hosting	5041 & 5042	May-20	108,482.81	54,241.41	54,241.41	
Sandbox Data Analysis/Hosting	5043 & 5044	Jun-20	107,192.81	53,596.41	53,596.41	
Sandbox Data Analysis/Hosting	5045 & 5046	Jul-20	108,267.81	52,171.02	52,171.02	3,925.78
Sandbox Data Analysis/Hosting	5048 & 5049	Aug-20	64,832.10	31,053.24	31,053.24	2,725.62
Sandbox Data Analysis/Hosting	5050 & 5051	Sep-20	59,457.10	28,365.75	28,365.75	2,725.60
Sandbox Data Analysis/Hosting	5052 & 5053	Oct-20	65,477.10	31,375.74	31,375.74	2,725.62
Sandbox Data Analysis/Hosting	5054 & 5055	Nov-20	62,897.10	30,085.75	30,085.75	2,725.60
Sandbox Data Analysis/Hosting	5056 & 5057	Dec-20	68,917.10	33,095.74	33,095.74	2,725.62
Sandbox Data Analysis/Hosting	5058 & 5059	Jan-21	66,982.10	32,128.25	32,128.25	2,725.60
Sandbox Data Analysis/Hosting	5060 & 5061	Feb-21	71,067.10	34,170.74	34,170.74	2,725.62
Sandbox Data Analysis/Hosting	5062 & 5063	Mar-21	70,207.10	33,740.75	33,740.75	2,725.60
Sandbox Data Analysis/Hosting	5064 & 5065	Apr-21	68,057.10	32,665.74	32,665.74	2,725.62
Sandbox Data Analysis/Hosting	5066 & 5067	May-21	72,787.10	35,030.75	35,030.75	2,725.60
Sandbox Data Analysis/Hosting	5068 & 5069	Jun-21	60,747.10	29,010.74	29,010.74	2,725.62
Sandbox Data Analysis/Hosting	5070 & 5071	Jul-21	60,962.10	29,118.63	29,118.63	2,724.84
Sandbox Data Analysis/Hosting	5072 & 5073	Aug-21	64,187.10	30,730.74	30,730.74	2,725.62
Sandbox Data Analysis/Hosting	5074 & 5075	Sep-21	64,617.10	30,945.75	30,945.75	2,725.60
Sandbox Data Analysis/Hosting	5076 & 5077	Oct-21	60,962.10	29,118.24	29,118.24	2,725.62
Sandbox Data Analysis/Hosting	5078 & 5079	Nov-21	60,747.10	29,010.75	29,010.75	2,725.60
Sandbox Data Analysis/Hosting	5080 & 5081	Dec-21	64,832.10	31,053.24	31,053.24	2,725.62
Sandbox Data Analysis/Hosting	5082	Jan-22	54,512.10	25,893.25	25,893.25	2,725.60
Sandbox Data Analysis/Hosting	5084	Feb-22	54,512.10	25,893.24	25,893.24	2,725.62
Sandbox Data Analysis/Hosting	5085	Mar-22	54,512.10	25,893.25	25,893.25	2,725.60
Sandbox Data Analysis/Hosting	5086	Apr-22	54,512.10	25,893.24	25,893.24	2,725.62
Sandbox Data Analysis/Hosting	5087	May-22	54,512.10	25,893.25	25,893.25	2,725.60

Amended Exhibit A – Litigation Data Services, LLC Invoices January 2018-present

Sandbox Data Analysis/Hosting	5088	Jun-22	54,512.10	25,893.24	25,893.24	2,725.62
Sandbox Data Analysis/Hosting	5089	Jul-22	54,512.10	25,893.25	25,893.25	2,725.60
Sandbox Data Analysis/Hosting	5090	Aug-22	54,512.10	25,893.24	25,893.24	2,725.62
Sandbox Data Analysis/Hosting	5091	Sep-22	54,512.10	25,893.25	25,893.25	2,725.60
Sandbox Data Analysis/Hosting	5092	Oct-22	54,512.10	25,893.24	25,893.24	2,725.62
Sandbox Data Analysis/Hosting	5095	Nov-22	54,512.10	25,893.25	25,893.25	2,725.60
Sandbox Data Analysis/Hosting	5101	Dec-22	54,512.10	25,893.24	25,893.24	2,725.62
Sandbox Data Analysis/Hosting	5103	Jan-23	54,512.10	25,893.25	25,893.25	2,725.60
Sandbox Data Analysis/Hosting	5108	Feb-23	54,512.10	25,893.24	25,893.24	2,725.62
Sandbox Data Analysis/Hosting	5113	Mar-23	54,512.10	25,893.25	25,893.25	2,725.60
Sandbox Data Analysis/Hosting	5117	Apr-23	54,512.10	25,893.24	25,893.24	2,725.62
			5,144,999.01	2,525,564.43	2,525,564.43	93,870.16

Litigation Data Services, LLC

P.O. Box 741
 Arnold, MD 21012

Invoice

Date	Invoice #
10/31/2018	4772

Bill To
Nathalie Kirsopp SCOTT+SCOTT LLP 126 South Main Street Colchester, CT 06415

P.O. No.	Terms	Project

Quantity	Description	Rate	Amount
	FX Data Center Back up and Disaster Recovery	13,550.00	13,550.00
	10/5/18 Rackspace Data Hosting Fee	45,833.49	45,833.49
		Total	\$59,383.49

Litigation Data Services, LLC

P.O. Box 741
Arnold, MD 21012

Invoice

Date	Invoice #
10/31/2018	4773

Bill To	
Nathalie Kirsopp SCOTT+SCOTT LLP 126 South Main Street Colchester, CT 06415	

P.O. No.	Terms	Project

[illegible]

Litigation Data Services, LLC

P.O. Box 741
 Arnold, MD 21012

Invoice

Date	Invoice #
8/31/2019	5022

Bill To
Nathalie Kirsopp SCOTT+SCOTT LLP 156 South Main Street Colchester, CT 06415

P.O. No.	Terms	Project

Quantity	Description	Rate	Amount
	FX Data Center Back up and Disaster Recovery August2019 Rackspace Data Hosting Fee (Note: +40 Terabyte SAN Disk Capacity) (4 x 10 TB LUN's)	13,550.00 86,117.81	13,550.00 86,117.81
		Total	\$99,667.81

Litigation Data Services, LLC

P.O. Box 741
Arnold, MD 21012

Invoice

Date	Invoice #
8/31/2019	5025

Bill To
Nathalie Kirsopp SCOTT+SCOTT LLP 156 South Main Street Colchester, CT 06415

P.O. No.	Terms	Project

[illegible]

Litigation Data Services, LLC

P.O. Box 741
 Arnold, MD 21012

Invoice

Date	Invoice #
7/10/2020	5044

Bill To
Nathalie Kirsopp SCOTT+SCOTT LLP 156 South Main Street Colchester, CT 06415

P.O. No.	Terms	Project
JUNE2020		

Quantity	Description	Rate	Amount
	RackSpace-IAD3 Ashburn, VA Colocation Hosting-IAD	154.50	154.50
	RackSpace-IAD3 Ashburn, VA Connection Device Hosting-IAD3	666.64	666.64
	RackSpace-IAD3 Ashburn, VA Firewall Hosting-IAD	218.12	218.12
	RackSpace-IAD3 Ashburn, VA SAN Hosting (SSD-Flash)-IAD	45,155.71	45,155.71
	RackSpace-IAD3 Ashburn, VA Server Hosting-IAD	13,995.02	13,995.02
	RackSpace-IAD3 Ashburn, VA Switch Hosting-IAD	317.05	317.05
	LightTower-DC Providence, RI DisasterRecoverySvr Hosting PVD	6,775.00	6,775.00
	LightTower-DC Providence, RI VEEAM BackupServerHosting	6,775.00	6,775.00
	LightTower-DC Providence, RI Firewall Hosting-PVD	110.77	110.77
	LightTower-DC Providence, RI RackSpace SAN Mirror -PVD	25,500.00	25,500.00
		Total	\$99,667.81

Litigation Data Services, LLC

P.O. Box 741
Arnold, MD 21012

Invoice

Date	Invoice #
7/10/2020	5043

Bill To	
Nathalie Kirsopp SCOTT+SCOTT LLP 156 South Main Street Colchester, CT 06415	

P.O. No.	Terms	Project
JUNE2020		

[illegible]

Litigation Data Services, LLC

P.O. Box 741
 Arnold, MD 21012

Invoice

Date	Invoice #
5/3/2021	5064

Bill To
Nathalie Kirsopp SCOTT+SCOTT LLP 156 South Main Street Colchester, CT 06415

P.O. No.	Terms	Project
APRILHard2021		

Quantity	Description	Rate	Amount
	RackSpace-IAD3 Ashburn, VA Colocation Hosting-IAD	154.50	154.50
	RackSpace-IAD3 Ashburn, VA Connection Device Hosting-IAD3	666.64	666.64
	RackSpace-IAD3 Ashburn, VA Firewall Hosting-IAD	218.12	218.12
	RackSpace-IAD3 Ashburn, VA Server Hosting-IAD	13,995.02	13,995.02
	RackSpace-IAD3 Ashburn, VA Switch Hosting-IAD	317.05	317.05
	LightTower-DC Providence, RI DisasterRecoverySvr Hosting PVD	6,775.00	6,775.00
	LightTower-DC Providence, RI VEEAM BackupServerHosting	6,775.00	6,775.00
	LightTower-DC Providence, RI Firewall Hosting-PVD	110.77	110.77
	LightTower-DC Providence, RI RackSpace SAN Mirror -PVD	25,500.00	25,500.00
		Total	\$54,512.10

Litigation Data Services, LLC

P.O. Box 741
Arnold, MD 21012

Invoice

Date	Invoice #
5/3/2021	5065

Bill To
Nathalie Kirsopp SCOTT+SCOTT LLP 156 South Main Street Colchester, CT 06415

P.O. No.	Terms	Project
APRILSoft2021		

[illegible]

Litigation Data Services, LLC

P.O. Box 741
 Arnold, MD 21012

Invoice

Date	Invoice #
3/21/2022	5084

Bill To
Nathalie Kirsopp SCOTT+SCOTT LLP 156 South Main Street Colchester, CT 06415

P.O. No.	Terms	Project
FEBHard2022		

Quantity	Description	Rate	Amount
	RackSpace-IAD3 Ashburn, VA Colocation Hosting-IAD	154.50	154.50
	RackSpace-IAD3 Ashburn, VA Connection Device Hosting-IAD3	666.64	666.64
	RackSpace-IAD3 Ashburn, VA Firewall Hosting-IAD	218.12	218.12
	RackSpace-IAD3 Ashburn, VA Server Hosting-IAD	13,995.02	13,995.02
	RackSpace-IAD3 Ashburn, VA Switch Hosting-IAD	317.05	317.05
	LightTower-DC Providence, RI DisasterRecoverySvr Hosting PVD	6,775.00	6,775.00
	LightTower-DC Providence, RI VEEAM BackupServerHosting	6,775.00	6,775.00
	LightTower-DC Providence, RI Firewall Hosting-PVD	110.77	110.77
	LightTower-DC Providence, RI RackSpace SAN Mirror -PVD	25,500.00	25,500.00
		Total	\$54,512.10

Litigation Data Services, LLC

P.O. Box 741
Arnold, MD 21012

Invoice

Date	Invoice #
1/2/2023	5101

Bill To
Nathalie Kirsopp SCOTT+SCOTT LLP 156 South Main Street Colchester, CT 06415

P.O. No.	Terms	Project
DECHard2022		

Quantity	Description	Rate	Amount
	RackSpace-IAD3 Ashburn, VA Colocation Hosting-IAD	154.50	154.50
	RackSpace-IAD3 Ashburn, VA Connection Device Hosting-IAD3	666.64	666.64
	RackSpace-IAD3 Ashburn, VA Firewall Hosting-IAD	218.12	218.12
	RackSpace-IAD3 Ashburn, VA Server Hosting-IAD	13,995.02	13,995.02
	RackSpace-IAD3 Ashburn, VA Switch Hosting-IAD	317.05	317.05
	LightTower-DC Providence, RI DisasterRecoverySvr Hosting PVD	6,775.00	6,775.00
	LightTower-DC Providence, RI VEEAM BackupServerHosting	6,775.00	6,775.00
	LightTower-DC Providence, RI Firewall Hosting-PVD	110.77	110.77
	LightTower-DC Providence, RI RackSpace SAN Mirror -PVD	25,500.00	25,500.00
		Total	\$54,512.10